

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION (TOLEDO)

PLUMBERS & PIPEFITTERS NATIONAL)	Civil Action No. 3:05-cv-07393-JGC
PENSION FUND; SEIU PENSION PLANS)	
MASTER TRUST; and WEST VIRGINIA)	<u>CLASS ACTION</u>
LABORERS PENSION TRUST FUND, On)	
Behalf of Themselves and All Others Similarly)	Senior Judge James G. Carr
Situated,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
MICHAEL J. BURNS and ROBERT C.)	
RICHTER,)	
)	
Defendants.)	

PLAINTIFFS WEST VIRGINIA LABORERS' PENSION TRUST FUND AND PLUMBERS
AND PIPEFITTERS NATIONAL PENSION FUND'S MOTION FOR CLASS
CERTIFICATION

LANDSKRONER • GRIECO • MERRIMAN, LLC
JACK LANDSKRONER (0059227)
1360 West 9th Street, Suite 200
Cleveland, OH 44113
Telephone: 216/522-9000
216/522-9007 (fax)

Liaison Counsel

ROBBINS GELLER RUDMAN
& DOWD LLP
MICHAEL J. DOWD
DEBRA J. WYMAN
LAURIE L. LARGENT
MAUREEN E. MUELLER
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Plaintiffs West Virginia Laborers' Pension Trust Fund and Plumbers and Pipefitters National Pension Fund (the "Funds") hereby move the Court for an order certifying this matter as a class action pursuant to Fed. R. Civ. P. 23(a) and (b)(3), appointing the Fund's as Class Representatives and Robbins Geller Rudman & Dowd LLP as Class Counsel. This motion is supported by the memorandum of law and declarations of Debra J. Wyman, Steven L. Smith, William T. Sweeny, Jr. and Jane D. Nettesheim, concurrently filed and submitted herewith, all pleadings and papers filed herein, arguments of counsel and any other matters properly before the Court.

DATED: March 9, 2012

ROBBINS GELLER RUDMAN
& DOWD LLP
MICHAEL J. DOWD
DEBRA J. WYMAN
LAURIE L. LARGENT
MAUREEN E. MUELLER

s/ DEBRA J. WYMAN

DEBRA J. WYMAN

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
JAMES E. BARZ
200 South Wacker Drive, 31st Floor
Chicago, IL 60606
Telephone: 312/674-4674
312/674-4676 (fax)

Lead Counsel for Plaintiffs

O'DONOGHUE & O'DONOGHUE LLP
LOUIS P. MALONE
4748 Wisconsin Avenue, N.W.
Washington, DC 20016
Telephone: 202/362-0041
202/362-2640 (fax)

Additional Counsel for Plaintiffs

LANDSKRONER • GRIECO • MERRIMAN,
LLC
JACK LANDSKRONER (0059227)
1360 West 9th Street, Suite 200
Cleveland, OH 44113
Telephone: 216/522-9000
216/522-9007 (fax)

Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 9, 2012.

s/ DEBRA J. WYMAN

DEBRA J. WYMAN

ROBBINS GELLER RUDMAN
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-3301

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: debraw@rgrdlaw.com

Mailing Information for a Case 3:05-cv-07393-JGC

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **James E. Barz**
jbarz@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Joseph M. Callow , Jr**
jcallow@kmklaw.com,ddaddesa@kmklaw.com
- **Michael J. Dowd**
miked@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Daniel A. Edelson**
daniel.edelson@kattenlaw.com
- **Jack Landskroner**
jack@lgmlegal.com,debra@lgmlegal.com
- **Laurie L. Largent**
llargent@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Arthur S. Linker**
arthur.linker@kattenlaw.com
- **Ann L. Lugbill**
alugbill@murphypllc.com,lisajohnsoncincinnati@gmail.com
- **Maureen E. Mueller**
mmueller@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Darren J. Robbins**
e_file_sd@rgrdlaw.com
- **Keith W. Schneider**
snichelson@ms-lawfirm.com
- **Scott D. Simpkins**
sdsimp@climacolaw.com
- **Samantha A. Smith**
e_file_sd@rgrdlaw.com
- **Joel W. Sternman**
j.sternman@kattenlaw.com,daniel.edelson@kattenlaw.com

- **Joseph P. Thacker**
jthacker@tmlpa.com,jbaker@tmlpa.com
- **Richard S. Walinski**
walinski@tmlpa.com,dchiesa@tmlpa.com
- **Debra J. Wyman**
debraw@rgrdlaw.com,hectorm@rgrdlaw.com,llargent@rgrdlaw.com,miked@rgrdlaw.com
- **David W. Zoll**
david@toledolaw.com,angela@toledolaw.com,christy@toledolaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Dean **N. Razavi**
Katten Muchin Rosenman - New York
575 Madison Avenue
New York, NY 10022

Jovana **Vujovic**
Katten Muchin Rosenman - New York
575 Madison Avenue
New York, NY 10022